

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

DON LIA, MOBILE MANAGEMENT, LLC,  
and N.R. AUTOMOTIVE, INC.,

Plaintiffs

– against –

MICHAEL SAPORITO and  
JESSE ARMSTEAD,

Defendants.

Case No. CV-11-3621 (SJF/ETB)


**AFFIDAVIT OF  
RONALD J. CAMPIONE, ESQ.**

[illegible]


I, RONALD J. CAMPIONE, of full age and sound mind, do hereby depose and say:

1. I am an attorney-at-law of the State of New York, associated with the law firm of Bressler, Amery & Ross, P.C., counsel for W&D Imports, Inc. d/b/a Willis Honda, and David Davis, proposed Intervenor/Defendants/Counter-Claimants/Cross-Claimants/ and Third-Party Plaintiffs, in this matter.

2. Attached hereto as EXHIBIT “A” is a Proposed Answer, Counterclaim, Crossclaim, and Third-Party Complaint submitted on behalf of Willis Honda and David Davis in support of their motion to intervene in this matter.

  
Ronald J. Campione

Sworn to and subscribed before me  
this 21<sup>st</sup> day of September 2011.

  
Notary Public, State of New Jersey  
136472  
**ELAINE A. NORAWONG**  
**A Notary Public of New Jersey**  
**My Commission Expires May 28, 2018**

# **Exhibit “A”**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

DON LIA, MOBILE MANAGEMENT, LLC,  
and N.R. AUTOMOTIVE, INC.,

Plaintiffs,

– *against* –

MICHAEL SAPORITO and  
JESSE ARMSTEAD,

Defendants,

– *and* –

W&D IMPORTS, INC. d/b/a WILLIS HONDA  
and DAVID DAVIS,

Intervenors/Defendants,  
Counterclaimants and  
Crossclaimants.

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W&D IMPORTS, INC. d/b/a WILLIS HONDA  
and DAVID DAVIS,

Third-Party Plaintiffs,

– *against* –

ALLSTAR MOTORS OF L.I., INC., ALL  
STAR MOTORS LLC d/b/a HAMILTON  
HONDA, AMERICAN HONDA MOTOR CO.,  
INC., and DOES 1 through 7,

Third-Party Defendants.

Case No. CV-11-3621 (SJF/ETB)

**PROPOSED**

**DEFENDANTS/INTERVENORS W&D  
IMPORTS, INC. d/b/a WILLIS  
HONDA'S AND DAVID DAVIS'  
ANSWER, COUNTERCLAIM,  
CROSSCLAIM, AND THIRD-PARTY  
COMPLAINT**

**ANSWER**

Intervenors, Defendants, Counterclaimants, Crossclaimants, and Third-Party Plaintiffs  
W&D Imports, Inc. d/b/a Willis Honda (“Willis Honda”) and David Davis (“Davis”) hereby  
answer Plaintiffs’ Complaint as follows:

1. The allegations set forth in the Complaint in Paragraphs 1 through 93 do not name or refer to Willis Honda or David Davis and no substantive answer is deemed required or appropriate.

#### COUNTERCLAIM

For their Counterclaim against Don Lia, Mobile Management, LLC, and N.R. Automotive, Inc., Willis Honda and Davis say:

1. Pursuant to Federal Rule Civil Procedure 13, Willis Honda and Davis hereby incorporate as if set forth in full their Complaint filed in *W&D Imports, Inc. d/b/a Willis Honda v. Lia, et al.*, Civil Action No. CV-11-4144 (E.D.N.Y. Aug. 25, 2011), ECF Doc. No. 1, as their Counterclaim against Plaintiffs in this matter. The Complaint, without exhibits, is attached hereto as EXHIBIT “A”.

#### CROSSCLAIM

For their Crossclaim against Michael Saporito and Jesse Armstead, Willis Honda and Davis say:

1. Pursuant to Federal Rule Civil Procedure 13(g), Willis Honda and Davis hereby incorporate as if set forth in full their Complaint filed in *W&D Imports, Inc. d/b/a Willis Honda v. Lia, et al.*, Civil Action No. CV-11-4144 (E.D.N.Y. Aug. 25, 2011), ECF Doc. No. 1, as their Crossclaim against Defendants Michael Saporito and Jesse Armstead, in this matter.

#### THIRD-PARTY COMPLAINT

For their Third-Party Complaint against Third-Party Defendants Allstar Motors of L.I., Inc., All Star Motors, LLC, American Honda Motor Co., Inc., and Does 1 through 7, Willis Honda and Davis say:

1. Pursuant to Federal Rule of Civil Procedure 14, Willis Honda and Davis hereby incorporate as if set forth in full their Complaint filed in *W&D Imports, Inc. d/b/a Willis Honda v. Lia, et al.*, Civil Action No. CV-11-4144 (E.D.N.Y. Aug. 25, 2011), ECF Doc. No. 1, as its Third-Party Complaint against Allstar Motors of L.I., Inc. (“Allstar I”), All Star Motors, LLC (“All Star”), American Honda Motor Co., Inc. (“Am. Honda”), and Does 1 through 7 (which are fictitious names, persons whose actions were unlawful and injurious to Plaintiffs for reasons alleged hereinafter, and whose identities cannot be ascertained until there is discovery from Defendants).

WHEREFORE, Willis Honda and Davis seek judgment and relief on their Counterclaim, Crossclaim and Third-Party Complaint against, respectively, Don Lia, Mobile Management, LLC, N.R. Automotive, Inc., Michael Saporito, Jesse Armstead, Allstar Motors of L.I., Inc., All Star Motors LLC d/b/a Hamilton Honda, American Honda Motor Co., Inc., and Does 1 through 7, for all the relief sought in their Complaint filed in *W&D Imports, Inc. d/b/a Willis Honda v. Lia, et al.*, Civil Action No. CV-11-4144 (E.D.N.Y. Aug. 25, 2011), ECF Doc. No. 1, herein incorporated in full by reference (Exhibit “A”), against these parties.

DATED: September , 2011  
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ERIC L. CHASE  
BRESSLER, AMERY & ROSS  
A Professional Corporation  
17 State Street  
New York, NY 10004  
Telephone: (212) 425-9300  
echase@bressler.com  
Attorneys for Movants W&D Imports, Inc.  
d/b/a Willis Honda and David Davis